ORIGINAL



RECEIVED

FENNEMORE CRAIG, P.C.
Jay L. Shapiro (No. 014650)

Todd C. Wiley (No. No. 015358)
3003 N. Central Ave.

Suite 2600
Phoenix, Arizona 85012
Attorneys for Litchfield Park Service Company

2009 MAR -9 A 11: 35

AZ CORP COMMISSION DOCKET CONTROL

Arizona Corporation Commission DOCKETED

MAR - 9 2009

DOCKETED BY

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

BEFORE THE ARIZONA CORPORATION COMMISSION

W-01427A-09-0104

IN THE MATTER OF THE APPLICATION OF LITCHFIELD PARK SERVICE COMPANY, AN ARIZONA CORPORATION, FOR A DETERMINATION OF THE FAIR VALUE OF ITS UTILITY PLANTS AND PROPERTY AND FOR INCREASES IN ITS WATER AND WASTEWATER RATES AND CHARGES FOR UTILITY

SERVICE BASED THEREON.

DOCKET NO: W-01427A-09-____

MOTION TO CONSOLIDATE

Litchfield Park Service Company, an Arizona public service corporation ("LPSCO" or "the Company"), hereby files this Motion to Consolidate the above-captioned matter with the Application filed by Litchfield Park Service Company in Docket No. SW-01428A-09-

Such relief is appropriate and will conserve judicial resources because both rate case filings are for the same company. The facts giving rise to these two rate cases and the legal issues presented therein are identical. The parties to these two rate cases are the same and no party will be prejudiced by consolidation. The customer bases of the water and wastewater divisions of LPSCO are largely the same, and LPSCO is operated and managed as one utility providing water and sewer service. Since these two matters are inextricably linked, consolidation is consistent with the interests of administrative efficiency and administrative economy.

26

25

1	RESPECTFULLY SUBMITTED this 9th day of March, 2009.
2	FENNEMORE CRAIG, P.C.
3	~ 100
4	By Wald State
5	Jay L. Shapiro Todd C. Wiley 3003 North Central Avenue
6	Suite 2600
7	Phoenix, Arizona 85012 Attorneys for Litchfield Park Service Company
8	Company
9	ORIGINAL and thirteen (13) copies of the foregoing were delivered this 9th day of March, 2009, to:
10	this 9th day of March, 2009, to:
11	Docket Control
12	Arizona Corporation Commission 1200 W. Washington St. Phoenix, AZ 85007
13	1 Hoelinx, 142 03007
14	By: Maria son for
15	
16	2173089.1
17	
18	
19	
20	
21	
22	
23	
24	

25

26